

July 19, 2005

John J. Manfreda, Administrator  
Alcohol & Tobacco Tax & Trade Bureau  
U.S. Treasury Department  
Box 14412  
Washington DC 2004-4412

Dear Administrator Manfreda:

Current federal alcohol beverage label regulations do not allow most beer, wine and distilled spirits companies to provide information about their products so that consumers can make informed choices about what to drink and how much to drink. TTB is to be commended for seeking public comment on this proposed change in regulations.

Food, soft drinks, over-the-counter drugs, and even dietary supplements provide consumers with basic consumer information on the label. Alcohol beverages (with some exceptions) are the only major class of consumable goods that do not provide this type of information on the label. TTB should allow labels voluntarily to list information such as serving size and servings per container, as well as alcohol, calories, fat, carbohydrates and protein per serving. Of all this information, the amount of alcohol per serving would be highly beneficial for consumers to have.

The standard serving definition used in the Dietary Guidelines (12 ounces of regular beer, 5 ounces of table wine and 1.5 ounces of 80 proof distilled spirits) is one widely used by U.S. government agencies, public health groups, consumer groups, and a majority of state driver's license manuals. It makes sense to use the same definition as the benchmark for labels.

Allowing placement of information on alcohol per serving and servings per container on beer, wine and distilled spirits labels will help consumers to better understand the government's advice. With this in mind, I am respectfully requesting TTB to act expeditiously to promulgate a regulation that permits meaningful consumer-oriented serving facts on labels for beer, wine and spirits. Meanwhile, I urge TTB to allow manufacturers to provide this kind of truthful, non-misleading information on labels while the rulemaking process proceeds.

Thank you in advance for your time and consideration.

Sincerely,

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